



**EPSTEIN DRANGEL LLP**

60 East 42nd Street, Suite 1250, New York, NY  
T: 212.292.5390 • E: mail@ipcounselors.com  
www.ipcounselors.com

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March 15, 2023

**VIA ECF**

Hon. Analisa Torres  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: *Moonbug Entertainment Ltd., et al. v. 640350 Store, et al.***  
**Case No. 22-cv-5042 (AT)**  
**Third Request For Extension of Time to File Motion for Default Judgment**

Dear Judge Torres,

We represent Plaintiffs Moonbug Entertainment Limited and Treasure Studio Inc. (“Plaintiffs”), in the above-referenced matter (the “Action”).<sup>1</sup> On November 29, 2022, the Court entered an Order directing Plaintiffs to file their Motion for Default Judgment by no later than January 30, 2023. (Dkt. 31). On January 20, 2023, Plaintiffs requested an extension of time, until March 3, 2023, to file their Motion for Default Judgment, which the Court granted. (Dkt. 35). For the reasons detailed below, Plaintiffs respectfully request a third extension of time to file their Motion for Default Judgment. In accordance with Your Honor’s Individual Rules of Practice, Plaintiffs respectfully submit the following:

1. **Original Deadline:** March 17, 2023
2. **The number of previous requests for adjournment:** Two, this is the third request for an extension of time to file Plaintiffs’ Motion for Default Judgment.
3. **The reason for the current request:** As indicated in Plaintiffs’ second request for an extension of time, AliExpress provided Epstein Drangel with the requested data evidencing Defaulting Defendants’ sales of Counterfeit Products to consumers located in New York (“AliExpress Data”) to support Plaintiffs’ claim for personal jurisdiction. However, upon review, Epstein Drangel discovered that there were errors in the AliExpress Data. Epstein Drangel requested clarification and full and accurate data from AliExpress. AliExpress responded earlier today, March 15, 2023, taking the position that production of the requested information, i.e. data relating to Defendants’ sales of Counterfeit Products via their Merchant Storefronts on AliExpress, was not covered by the TRO. Epstein Drangel reached out to AliExpress’ outside counsel for assistance as such data falls squarely within the expedited discovery ordered in Section V(E) of the TRO, but we do not

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<sup>1</sup> Where a defined term is referenced herein but not defined, it should be understood as it is defined in the Glossary in Plaintiffs’ Complaint or Application.

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anticipate receiving a response in time to file Plaintiffs' Motion for Default Judgment by March 17, 2023.

4. **Whether the adversary consents:** All of the Defendants remaining in this Action are currently in default, thus Plaintiffs did not seek their consent.
5. **Proposed alternative dates:** Plaintiffs respectfully propose filing their Motion for Default Judgment by no later than April 28, 2023 to allow sufficient time for Epstein Drangel to work with AliExpress and/or AliExpress' outside counsel in obtaining the AliExpress Data.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

**EPSTEIN DRANGEL LLP**

BY: /s/ Danielle S. Futterman  
Danielle S. Futterman (DY 4228)  
dfutterman@ipcounselors.com

60 East 42nd Street, Suite 1250  
New York, NY 10165

Telephone: (212) 292-5390

Facsimile: (212) 292-5391

*Attorneys for Plaintiffs*

*Moonbug Entertainment Limited and Treasure  
Studio Inc.*

GRANTED.

SO ORDERED.

Dated: March 16, 2023  
New York, New York

  
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ANALISA TORRES  
United States District Judge